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August 19, 2022

Veronica Dickerson
Department of the Interior
4316 Nichols Road
Medina, Ohio 44256

Subject: Errata – Soil Non-Time Critical Removal Action Work Plan, Pacific Gas and Electric Company Topock Compressor Station, Needles, California.

Dear Ms. Dickerson:

This submittal provides notice of the need to make a minor revision to Appendix D of the Final Soil Non-Time Critical Action (NTCRA) Work Plan, dated June 2022. It was brought to PG&E's attention on Thursday, August 11, 2022 by the Tribal monitors that Appendix D contained language that conflicted with previously agreed upon decisions (items are outlined below). To ensure consistency with discussions during the Response to Comment (RTC) meetings on April 26, 2022 and May 5, 2022, Consultative Work Group (CWG) meeting June 22, 2022 as well as the onsite project initiation meeting on July 14, 2022. The revision will correct the Appendix D text to remove the requirements for nonhazardous soil stockpiles to be placed on a liner.

Appendix D Section 2.3.3 – Stockpile Management (The language is provided below as it currently reads in Appendix D):

Nonhazardous Soil above Soil Management Screening Levels

Soil above approved soil management screening levels can be stockpiled if placed on liner or placed in roll-off bins or similar containers. The following BMPs will be followed:

- *Stockpiles will be constructed with liners and perimeter berms to prevent release or infiltration of liquids.*
- *The perimeter berm will be constructed of clean materials (such as straw wattle under the liner).*
- *If a cover is employed, it will extend over the outer edges of the perimeter berm and liner so that rainfall is prevented from entering the bermed area.*

Appendix D Section 2.3.3 – Stockpile Management (The revised language to be in line with the RTC is provided below):

Nonhazardous Soil above Soil Management Screening Levels

Soil above approved soil management screening levels can be stockpiled ~~if placed on liner~~ or placed in roll-off bins or similar containers. The following BMPs will be followed:

- *Stockpiles will be constructed with ~~liners and~~ perimeter berms to prevent release or runoff of liquids.*
- *The perimeter berm will be constructed of clean materials (such as straw wattle ~~under the liner~~).*
- *If a cover is employed, it will extend over the outer edges of the perimeter berm ~~and liner~~ so that rainfall is prevented from entering the bermed area.*

Ms. Dickerson
August 19, 2022

Justification:

During Response to Comment meetings for the Soil NTCRA Work Plan held on April 26, 2022 and May 5, 2022, CWG June 22, 2022 as well as the onsite Project Initiation meeting held on July 14, 2022, discussions between PG&E, Agencies, and Stakeholders were held regarding the management of soil and stockpiles within the Soil Processing Yard (SPY). During those meetings, the use of liners beneath stockpiles of contaminated soil above approved soil management screening levels during the Soil NTCRA was discussed. Based on previous experience of stockpile management within the SPY, and due to the nature of the NTCRA soil screening process, it was determined that plastic liners would not be appropriate to use beneath the stockpiles to avoid waste plastic in the backfill. Instead, post-stockpile confirmation sampling will be conducted to confirm the soils beneath the stockpiles have not been impacted by Soil NTCRA activities (Section 2.3.3.1 in NTCRA Work Plan). Confirmation soil sampling results will be reported to DOI and included in the completion report.

Please call me at (415) 314-8530 if you have any questions regarding this report.

Sincerely,

John Glass,

A handwritten signature in blue ink that reads "John Glass". The signature is written in a cursive, flowing style.

On behalf of Iain Baker

Attachment – Relevant RTCs from April 26, 2022 and May 5, 2022 RTC Meetings

PG&E Topock Compressor Station – Responses to Comments on the Soil Non-Time-Critical Removal Action Work Plan

PG&E Topock Compressor Station, Needles, California

Comment No.	Agency/ Stakeholder	Unique Comment ID (if applicable) ²	Section/ Page	Reference Text	Soil Non-Time-Critical Removal Action Work Plan Comment (Please provide sufficient detail, include specifically what you are looking for)	PG&E Response	DTSC Response	DOI Response	Tribes Response	Final Resolution
151	DTSC-24	24	Page 2-9, Section 2.3.2	However, no bottom liner will be required if the stockpile is located within the extent of the TAA.	No bottom liner is fine as long as a stockpile is placed on top of a “dirty” TAA material/soil area that will be excavated and removed later. Otherwise, bottom liners are requested to help guide work crews with removing all of the potentially or confirmed contaminated pile while minimizing removal of cleaner soil. Revision is requested to clarify this issue. Please ensure that similar changes are made to the BMP Plan (Appendix D).	The text in Section 2.3.2 and Appendix D have been revised to indicate temporary staging of materials in a TAA will occur on potentially contaminated material slated to be excavated.				Text revised, comment resolved pending review of BMPs for AOC 14.
153	DTSC-26	26	Page 2-9, Section 2.3.3	N.A.	The section should clarify how and when contaminated stockpiles will be covered to prevent dispersion due to high winds or rain. Contaminated materials (e.g., excavated soil and debris and fine materials) should be placed in covered bins or on lined plastic sheeting and then covered until transported. In general, contaminated soil and materials should be placed on tarps to assist in removing the soil later. Confirmation soil sampling would be conducted after the stockpile and liner have been removed.	Section 2.3.3 provides an overview of stockpile construction and management. The requested details are provided in the BMP Plan (Appendix D).				See Response to Comment #151
154	DTSC-27	27	Page 2-9, Section 2.3.3, 1 st bullet	Temporary staging of excavated soil and debris may also be required at individual TAAs prior to transport to the SPY.	Depending how the temporary staging is conducted, confirmation soil samples may need to be taken to ensure all significant contamination associated with the temporary pile has been appropriately removed from the area. Please revise the plan to address this issue.	Temporary staging will occur on “dirty” and “to-be” excavated material. Therefore, liners and confirmation soil sampling will not be warranted. See response to Comment #151				See Response to Comment #151
161	DTSC-34	34	Page 2-11, Section 2.3.7	N.A.	After all contaminated soils have been removed offsite, a confirmation sampling program should be implemented to ensure contaminated media were properly handled and appropriately removed. The work plan should include the process for tracking the areas where contaminated soils were placed, managed, or processed so that they can be promptly surveyed and identified for confirmatory soil sampling after contamination is taken offsite. Baseline soil sampling might be prudent.	Post-construction confirmation samples will be collected from all areas where contaminated media was handled or stored. Placement, management, and processing of contaminated soil will only occur within the SPY. Tracking of soil will follow the same process used for the groundwater remedy. Baseline samples have already been collected from the SPY. See new Section 2.3.3.1				Text revised, comment resolved.

Notes:

¹ Cocopah = Cocopah Indian Tribe; DOI = U.S. Department of the Interior; DTSC = California Department of Toxic Substances Control; FMIT = Fort Mojave Indian Tribe; MWD = Metropolitan Water District; Quechan = Quechan Indian Tribe

² Comment ID as it appeared in the commenter’s original comment letter (where applicable).

N.A. = not applicable